

EXHIBIT 9

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE :
4 UNITED STATES VIRGIN :
ISLANDS, :

CASE NO.
1:22-CV-10904
-JSR

5 Plaintiff, :

6 v. :

7 JPMORGAN CHASE BANK, :
N.A., :

8 Defendant/Third Party :
9 Plaintiff. :

10 JPMORGAN CHASE BANK, :
N.A., :

11 Third Party Plaintiff, :

12 v. :

13 JAMES EDWARD STALEY, :

14 Third Party Defendant. :

15 CONFIDENTIAL - ATTORNEYS' EYES ONLY

16 May 3, 2023

17
18 Videotaped deposition
19 of WILLIAM D. LANGFORD, taken pursuant to
20 notice, was held at the law offices of
21 Boies Schiller Flexner LLP, 55 Hudson
22 Yards, New York, New York, and remotely,
beginning at 9:37 a.m., on the above
date, before Michelle L. Gray, a
Registered Professional Reporter,
Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.

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1 She expresses surprise that
2 there hasn't been a subpoena, correct?

3 I'm in the first paragraph.

4 A. She finds odd -- yeah, she
5 finds odd.

6 Q. Okay. And then also notes
7 that there had been a subpoena some time
8 ago to Bear Stearns, correct?

9 A. Yes.

10 Q. And then she answers that
11 question about why this came up recently.
12 And she said that his accounted alerted
13 in Fortent for cash activity, which it
14 does from time to time.

15 Correct?

16 MR. GAIL: Objection.

17 THE WITNESS: Sorry, repeat
18 that question.

19 BY MS. SINGER:

20 Q. So I'm asking -- she
21 responded to your question about why this
22 came up by explaining that there had been
23 a Fortent alert for cash activity,
24 correct?

1 Times, Landon Thomas reported that
2 Epstein charges a flat fee on the assets
3 entrusted to him, anywhere from
4 \$25 million to \$100 million, but doesn't
5 collect any portion of the profits. This
6 is oddly reminiscent of Bernie Madoff's
7 compensation scheme."

8 Have I read that correctly?

9 A. Yes.

10 Q. And then finally he says, in
11 the bottom paragraph, "We do know however
12 that Epstein actually has invested money
13 with both Citigroup and Bear Stearns" --
14 oh, I'm sorry. Da-da-da.

15 Turning the page. "On the
16 other hand, there were no" -- "there are
17 no SEC filings disclosing Epstein's
18 holding. Not one. It is hard to see how
19 he could be managing billions without
20 ever tripping a disclosure trigger,
21 unless he avoids the stock market
22 altogether and only invests in private
23 deals. This is another red flag."

24 Have I read that correctly?

1 A. Yes.

2 Q. And he concludes, "We have
3 no concrete evidence that Epstein is
4 running a scam. But given the red flags
5 and the fact that he reportedly controls
6 billions of dollars, isn't that something
7 worth looking into?"

8 Have I read that correctly?

9 A. Yes.

10 Q. Do you know if, either
11 before or after this article or Maryanne
12 Ryan's e-mail, JPMorgan ever looked into
13 Epstein's business activities?

14 A. I don't know about
15 specifically coming from this
16 perspective, no.

17 Q. And do you -- do you -- are
18 you aware of whether there was ever any
19 investigation by JPMorgan of what Jeffrey
20 Epstein's business was or who his clients
21 were?

22 A. I don't know.

23 Q. Did you ever hear that there
24 was such an investigation?